DATE	ITEM_			
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1-31-95	Amend	ed RCRAG	part Apern	ict Application
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G- General, I- Inspections

P- Permits, GW- Ground Water

C- Closure

File: Permitting Asheville Dyeing + Fin. NCD 070 619 663

KIRKLAND & ELLIS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

4

Brlan R. Land To Call Writer Direct: 202 879-5956 655 Fifteenth Street, N.W. Washington, D.C. 20005

202 879-5000

Facsimile: 202 879-5200

January 31, 1995

VIA FEDERAL EXPRESS

Mr. James Edwards
Hazardous Waste Section
North Carolina Department of Environment
Health and Natural Resources
401 Oberlin Road
Raleigh, N.C. 27605





Re:

Amended RCRA Part A Permit Application - Asheville Dyeing and Finishing, Swannonoa, North Carolina - NCD070619663

Dear Mr. Edwards:

Our client, Anvil Knitwear, Inc. (the "Company"), has purchased certain assets of the Anvil Knitwear Division of McGregor Corporation and Winston Mills, Inc. The transaction closed on January 28, 1995. As part of the transaction, the Company acquired the Asheville Dyeing and Finishing facility located on Warren Wilson College Road, Swannanoa, North Carolina 28778.

The above-referenced facility is the subject of corrective action pursuant to RCRA. Pursuant to the terms of the sale, Winston Mills, Inc. (the Seller) will retain responsibility for the RCRA corrective action. I have discussed these circumstances with you and you indicated that the parties should submit an amended Part A application listing Anvil Knitwear, Inc. as the new owner of the facility, and listing Winston Mills, Inc. as the operator. Such an amended Part A application is enclosed. Other than the change in owner, the application is virtually identical to the application submitted by Winston Mills, Inc. in 1990.

The transaction will not affect the day-to-day operations of the facility. Moreover, we have been assured that Winston Mills, Inc. will continue to fulfill its requirements under RCRA.

KIRKLAND & ELLIS

Mr. James Edwards January 31, 1995 Page 2

I appreciate your attention to this matter. If you require any additional information, please call me at (202) 879-5956.

Sincerely,

Brian R. Land

Counsel to Anvil Knitwear, Inc.

Enclosure

cc: Steve Oster, Esq. Jack Hollander

Steve Pegg

Yvonne Bailey, Esq.

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EPA Form 8700-23 (Rev. 11-30-93) Previous edition is obsolete. -1 of 7 -

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B. Street or P.O. Box

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VI. Facility Contact Address (See Instructions)

A. Contact Address Location Mailing Other

City or Town

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Zip Code

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XI. Nature of Business (Provide a brief description)

The facility is a manufacturing facility which knits, dyes, and finishes fabrics for the screen print industry. The facility produces cotton and poly-cotton circular knit fabrics.

XII. Process Codes and Design Capacities

- A. PROCESS CODE Enter the code from the list of process codes below that best describes each process to be used at the facility.

 Thirteen lines are provided for entering codes. If more lines are needed, attach a separate wheel of paper with the additional information. For other processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the apace provided in Item XIII.
- B. PROCESS DESIGN CAPACITY For each code entered in column A, enter the capacity of the process.
 - AMOUNT Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 UNIT OF MEASURE For each amount entered in column B(1), enter the code from the first of unit measure codes below that describes
 - UNIT OF MEASURE For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes
 the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS Enter the total number of units used with the corresponding process code

PROC CODE		MEASUR	RIATE UNITS OF E FOR PROCESS IN CAPACITY	PROC		PROC	ESS	MEASURE F	TE UNITS OF OR PROCESS CAPACITY
D79	<u>Disposal:</u> Underground injection	Gallons; Liter or Liters Per	rs; Gallons Per Day;	T87 T86	Smelting Or Refin Titaniun	iing Fu	rmace		
D80	Landfili	Acre-feet or I		1 ' ' '	Chloride				
D81	Land Treatment	Acres or Hec			Oxidatio				
D82	Ocean Disposal	Gallons Per L	Pay r Liters Per Day	T89	Methane			Gallons Per i	Day; Liters Per
D83	Surface Impoundment	Gallons or Lit	ters		Fumace		* !		Per Hour, Short
D99	Other Disposal Storage:	Any Unit of M	leasura Listed Below	790	Pulping Recover	ry Ėum	ace 🔪	Tons Per Ho	ur; Kilograms stric Tons Per
S01	Container (Barrel, Drum, Etc.)	Gallons or Lit	ters	T91	Combus Used In	The R	ecovery	Day; Metric 1	ons Per Hour;
S02	Tank	Gallons or Lh			Spent S		es From		er Day; or Btu's
S03	Waste Pile		or Cubic Meters	792	Helono	ununc . Acid	Acid Furnaç as	Per Hour	
S04	Surface Impoundment	Gallons or Lit		793	Other In	r AWG I	- u: : iaçap		
S05	Drip Pad	Gailons or Lit		# '	Furnace				
S06	Containment	Cubic Yards	or Cubic Meters	3	40 CFR				
S99	Building-Storage	A 11-14 - 4 84		T94	Contain		-	Cubic Yards	or Cubic Meters
200	Other Storage	Any Unit of M	leasure Listed Below	1	Bullding		ment	00010 /0100	01 00010 1101013
	<u>Treatment:</u>				_				
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T02	Surface Impoundment	Gallons Per L	ay or Liters Per Day	X01	Open B		Open		Weasure Listed
T03	Incinerator	Short Tons P	er Hour; Metric Tons lions Per Hour; Liters	X02	Detonat			Selow Oh T 1	n
T04	Other Treatment	Per Hour; or I Gallons Per L Pounds Per H	ions Per Hour; Liters Stu's Per Hour Day; Liters Per Day; Hour; Short Tons Per Ims Per Hour; Metric	AUZ	Mac nan	icai Pți	ocessing	Tons Per Ho	
T80	Boiler	Tons Per Day	r; Metric Tons Per Tons Per Day; or Ir	ХOЗ	Thermai	(Un)t		Gallons Per Day; Pounds Tons Per Ho	or nou: Day; Liters Per Per Hour; Shor ur; Kilograms Pe Tons Per Day;
T81	Cement Kiln		ay; Liters Per Day;					Metric Tons	Per Hour; Short
T82	Lime Kiin	Pounds Per L	lour; Short Tons Per						v: or Btu's Per
T83	Aggregate Kiln	Hour: Kilogra	ms Per Hour; Metric	1				Hour	,, · -·
T84	Phosphate Kiin	Tons Per Day	: Metric Tons Per	X04	Geologi	c Repo	sitory		or Cubic Meters
T85	Coke Oven	Hour; Short T	ons Per Day; or	X99	Other S	ubpart	X		Measure Listed
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XII.					Design Capabilities (Continued)					1 10 111-22
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Lis	. 1		Proce	. 3	B. PROCESS DESIGN CAP	ACITY		C. Process	For Official	
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Form Approved, OMB No. 2050-0034 Expires 9-30-96 GSA No. 0248-EPA-OT

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- XIV. Description of Hazardous Wastes
 - A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 251 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpert C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
 - B. ESTIMATED ANNUAL QUANTITY For each listed weste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
 - C UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	κ
TONS	τ	METRIC TONS	м

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

- D. PROCESSES
 - 1. PROCESS CODES:

For listed hazerdous waste: For each listed hazerdous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A. select the code(s) from the list of process codes contained in item XII A, on page 3 to indicate all the processes that will be used to store, treat, and/ or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "090" in the extreme right box of item XIV-D(1).
- Enter in the space provided on page 7, them XIV-E, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - HIZARDOUS wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

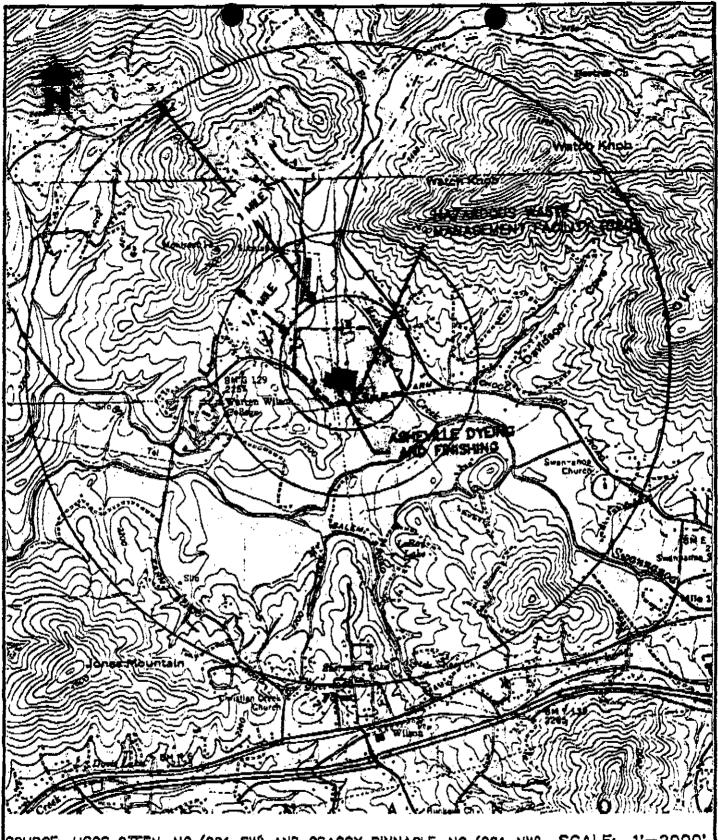
- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Wasta Number that can be used to describe the waste, in column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corresive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an Incinerator and disposal will be in a landfill.

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XV. Map	330000 Annual Annua
Attach to this application a topographic map, or other equivalent map, of the area extending to at least boundaries. The map must show the outline of the facility, the location of each of its existing and prostructures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where include all springs, rivers and other surface water bodies in this map area. See instructions for precisive. XVI. Facility Drawing	posed intake and discharge it injects fluids underground
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All existing facilities must include a scale drawing of the facility (see instructions for more detail).	
XVII. Photographs	· · · · · · · · · · · · · · · · · · ·
All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instruction XVIII. Certification(s)	ng structures; existing storage, ns for more detail).
I certify under penalty of law that this document and all attachments were prepared under naccordance with a system designed to assure that qualified personnel properly gather and evalues Based on my inquiry of the person or persons who manage the system, or those persons directly the information, the information submitted is, to the best of my knowledge and belief, true, accumentation are significant penalties for submitting false information, including the possibility knowing violations.	ate the information submitted. ctly responsible for gathering rate, and complete. I am aware
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SOURCE: USGS OTEEN, NC (201-SW) AND CRAGGY PINNACLE, NC (201-NW) SCALE: 1'-2000'

是 PROPERTY LINE

SITE LOCATION N 82 25' 56" W 35 36' 44"

ITEM XV. MAP



ITEM XVII. PHOTOGRAPHS



SITE OF FORMER UNDERGROUND STORAGE TANK PIT (D80 LANDFILL)
28 JUNE 1990

EPA ID No. NCD070619663

Amended Part A Application Asheville Dyeing & Finishing Swannanoa, North Carolina January 26, 1994

ATTACHMENT

ITEM III.D. FACILITY EXISTENCE DATA

Current hazardous waste compliance activities for the facility, including this amended Part A application, are a result of the Administrative Order on Consent entered between Winston Mills, Inc. and the North Carolina Department of Environment, Health, and Natural Resources on 29 August 1990. The date of commencement of hazardous waste operations at the facility, as requested in Item III.D. of the Part A application, does not readily apply to this specific hazardous waste compliance activity. The following passage from the "Stipulations and Findings of Fact," as contained in the Administrative Order or Consent, more accurately depicts the date of hazardous waste activity at the facility:

"The Hazardous Waste Section allows that prior to April 1985, as part of a dry cleaning process at the site, the prior owner/operator of the Asheville Dyeing & Finishing site utilized a raw material underground storage tank and a hazardous waste underground storage tank, both for the storage of tetrachloroethylene. In April 1985, the tanks were removed. Soil samples were collected from the bottom of the tank pits and analyzed by Environmental Testing, Inc. for the presence of solvents. Sample analysis results indicated detectable levels of 1,1,2trichloroethylene in the soil beneath the tanks. In addition, approximately 14 years ago, an alleged spill of solvent by the previous owner/operator, consisting primarily of tetrachloroethylene occurred at the facility and it is believed that some of the solvent entered an 8-inch drain pipe and followed this pipe to Bee Tree Creek, approximately 1100 feet east of the plant building. Most of the solvent reportedly entered the ground. In 1988, Westinghouse Environmental Services collected soil samples from the site. The samples were analyzed by Industrial and Environmental Analysis, Inc. for volatile organics. Three hazardous constituents were reported in the results: acetone, methylene chloride, and tetrachloroethylene. From the alleged actions of the previous owner/operator, the trichloroethylene, tetrachloroethylene, and methylene chloride contamination in soils at the site constitutes either the disposal of listed hazardous wastes (F001, F003) or the presence of hazardous constituents, as defined in 40 CFR 260.10, codified at 10 NCAC 10F.0002 and 40 CFR 261, codified at 10 NCAC 10F.0029. For the purpose of this order, the Waste Management Unit (the Unit) is the hazardous waste underground storage tank described above. The facility neither admits nor denies any of the allegations set out in this paragraph."

EPA ID No. NCD070619663

Amended Part A Application Asheville Dyeing & Finishing Swannanoa, North Carolina January 26, 1994

This amended Part A application, as filed herein, addresses the underground storage tank pit area where waste tetrachloroethylene was formerly stored.

ITEM XII. PROCESS CODES AND DESIGN CAPABILITIES

Volume of D80 landfill based on estimated dimensions of former underground storage tank pit of 10 ft. x 20 ft. x 10 ft. deep.

ITEM XIV. DESCRIPTION OF HAZARDOUS WASTES

Estimated quantity of waste based on assumption of maximum 1,1,2-trichloroethylene concentration in soil of 1 mg/kg over a 10 ft. x 20 ft. x 1 ft. deep area (i.e. soil immediately underlying previous underground storage tank). This waste represents leakage or spillage associated with operation of an underground storage tank taken out of service in March 1985. The estimated quantity is a conservative, cumulative total of trichloroethylene potentially present in subsurface soils. No additional trichloroethylene wastes are being or will be generated.

ITEM XV. MAP

According to "Geology and Groundwater Resources of the Asheville Area, North Carolina" (Trapp, 1970), four privately-owned wells are located within the immediate vicinity of the facility. Two of these wells are reported to be observation wells; use of the remaining two wells is not identified. However, none of the wells are located within 1/4-mile of the facility. The C.D. Owens Company, located within 1/4-mile of the facility, owns and operates several wells on its property; however, these wells are reportedly used for industrial purposes.



800 WACHOVIA BUILDING RALEIGH, NORTH CAROLINA 27601

MAILING ADDRESS

POST OFFICE BOX 831 RALBIOH, NORTH CAROLINA 27602 TELEPHONE (919) 755-2100 TELECOPY (919) 755-2150 THLEX 806498

AND 2400 WACHOVIA ΒΡΙΙΦΙΝΟ FOST OFFICE DRAWER 84 WINSTON-SALEM, NC 27102 . тисприоне (919) 721-3600 оте тилисору (919) 721-3660

1600 ONE TRIAD PARK

ASHEVILLE DAZ

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YVONNE C. BAILEY (919) 755-2129

CHARLOTTS OFFICE 3300 ONE PIRST UNION CENTER

301 SOUTH COLLEGE STREET

CHARLOTTE, NC 28202-6025

TELEPHONE (704) 331-4900

TRLECOPY (704) 331-4955

May 28, 1992

Mr. Jerome H. Rhodes Chief, Hazardous Waste Section Division of Solid Waste Management Department of Environment, Health, and Natural Resources Post Office Box 27687 401 Oberlin Road Raleigh, NC 27611-7687

> Rc: Asheville Dyeing and Finishing Facility

> > Swannanoa, North Carolina

Dear Jerry:

Enclosed is a Soil Assessment Report dated May 22, 1992, prepared by Aquaterra, Inc., in connection with the above-referenced facility. As we discussed with you and your staff, AD&F is proposing to put in a wastewater pre-treatment system at its Swannanoa facility as required by the Metropolitan Sewage District in Asheville, North Carolina. Although the pre-treatment facility will not be constructed in the area where the former waste underground storage tank is located, AD&F requested Aquaterra to sample the area to insure that tetrachloroethene (PCE), or other volatile organic compounds, had not impacted the area. As you can see from the enclosed, analytical data indicates the presence of volatile organic compounds just above analytical detection methods at only one location in the study area. As evidenced by analytical data collected from monitoring wells MW-9 and MW-9d, groundwater has not been impacted in the area.

If you have any comments about this report, do not hesitate to contact me.

Truly yours,

Yvonne C. Bailey

YCB/vlt

cc:

Jacob Hollander, Esq. (w/enclosure)

Steve Pegg (w/enclosure)

R. Howard Grubbs, Esq. (w/o enclosure)

James A. Carpenter (w/o enclosure)

Bob Glaser (w/o enclosure) Rob McDaniel (w/o enclosure) Spring Allen (w/o enclosure) Kirk Pollard (w/o enclosure)

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XI: Nature of Busines

Asheville Dyeing & Finishing (AD&F) is a manufacturing facility which knits, dyes, and finishes fabrics for the screen print industry. AD&F produces cotton and poly-cotton circular knit fabrics.

XII Process – Codes and Design/Capacities : ↓

- A. PROCESS CODE: Enter the code from the flat of process codes below that best describes each process to be used at the facility. It welve times are provided for entering codes. If more lines are preceded, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in time. XIII.
- B. PROCESS DESIGNECAPACITY—For each code entered in column A enterthe capacity of the process.

 A. AMOUNT—Enter the emount. In a case, where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of (vaste longing process unit.

 Z. UNIT OF MEASURE—For each amount entered in column/TB(I), enter the code from the list of unit measure codes below that
 - describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. PROCESS TOTAL NUMBER OF UNITS Enter the total number of units used with the corresponding pro-

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D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS PER HOU	IR E
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	04110110 -55 549	l
D81	LAND APPLICATION	ACRES OR HECTARES	GALLONS PER DAY	
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS	. <i></i> L
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS		
			LITERS PER HOUR	H
	STORAGE:		LITERS PER DAY , .	v
S01	CONTAINER	GALLONS OR LITERS	SHORT TONS PER I	uouo o
COO	(barrel, drum, etc.)	CALLONG OD LITEDO	SHUKI IUNS PER I	100H U
S02 S03	TANK WASTE PILE	GALLONS OR LITERS CUBIC YARDS OR CUBIC METERS	METRIC TONS PER	HOUR W
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS		
304	SORFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER L	DAYN
Ä	TREATMENT:		METRIC TONS PER	DAY
T01	TANK	GALLONS PER DAY OR LITERS PER DAY		
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUI	R
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC	KILOGRAMS PER H	OURR
		TONS PER HOUR; GALLONS PER HOUR;		
		LITERS PER HOUR; OR BTU'S PER HOUR	CUBIC YARDS	Y
Ĭ			CUBIC METERS	c
T04	OTHER TREATMENT	GALLONS PER DAY; LITERS PER DAY;		
	(Use for physical, chemical,	POUNDS PER HOUR; SHORT TONS PER	ACRES	B
4	thermal or bioloical treatment	HOUR; KILOGRAMS PER HOUR; METRIC	ACRE-FEET	А
§ .	processes not occurring in tanks, surface impoundment or	TONS PER DAY; METRIC TONS PER HOUR: OR SHORT TONS PER DAY	3	
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	provided in item XIII.)		HECTARE-METER .	F
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(W. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CER, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CER, Part 261 Subpart D, enter the four-digit number(s) from 40 CER, Part 261 Subpart C that describes the couracted sites and of the toda contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY. For each listed waste entered in column, A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contemprate entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contemprate.
- C: UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	κ
TONS	Τ	METRIC TONS	м

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste. For each characteristic ortixic contaminant entered in column A, select the code(s) from the list of processes codes contained in Item XII. A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS GODES. IF MORE ARE NEEDED;

- 1. Enter the first two as described above.
- 2. Enter "000" in the extreme right box of Item XIV-D(I).
- Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).
- PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D:(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter k in column A. On the same line complete columns B.C.
 and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat store
 and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each EPA Hezardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED C. UNIT OF ANNUAL MEASURE QUANTITY OF (enter WASTE code)		OCESS (2) PROCESS DESCRIPTION: (If a code is not entered in D(1))
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ATTACHMENT

ITEM III.D. FACILITY EXISTENCE DATA

Current hazardous waste compliance activities for the Asheville Dyeing & Finishing facility, including this Part A application, are a result of the Administrative Order on Consent entered between Asheville Dyeing & Finishing and the North Carolina Department of Environment, Health, and Natural Resources on 29 August 1990. The date of commencement of hazardous waste operations at the facility, as requested in Item III.D. of the Part A application, does not readily apply to this specific hazardous waste compliance activity. The following passage from the "Stipulations and Findings of Fact," as contained in the Administrative Order on Consent, more accurately depicts the date of hazardous waste activity at the facility:

"The Hazardous Waste Section alleges that prior to April 1985, as part of a dry cleaning process at the site, the prior owner/operator of the Asheville Dyeing & Finishing site utilized a raw material underground storage tank and a hazardous waste underground storage tank, both for the storage of tetrachloroethylene. In April 1985, the tanks were removed. Soil samples were collected from the bottom of the tank pits and analyzed by Environmental Testing, Inc. for the presence of solvents. Sample analysis results indicated detectable levels of 1,1,2-trichloroethylene in the soil beneath the tanks. In addition, approximately 14 years ago, an alleged spill of solvent by the previous owner/operator, consisting primarily of tetrachloroethylene occurred at Asheville Dyeing & Finishing's site and it is believed that some of the solvent entered an 8-inch drain pipe and followed this pipe to Bee Tree Creek, approximately 1100 feet east of the plant building. Most of the solvent reportedly entered the ground. In 1988, Westinghouse Environmental Services collected soil samples from the site. The samples were analyzed by Industrial and Environmental Analysts, Inc. for volatile organics. Three hazardous constituents were reported in the results: acetone, methylene chloride, and tetrachloroethylene. From the alleged actions of the previous owner/operator, the trichloroethylene, tetrachloroethylene, and methylene chloride contamination in soils at the site constitutes either the disposal of listed hazardous wastes (F001, F003) or the presence of hazardous constituents, as defined in 40 CFR 260.10, codified at 10 NCAC 10F.0002 and 40 CFR 261, codified at 10 NCAC 10F.0029. For the purpose of this order, the Waste Management Unit (the Unit) is the hazardous waste underground storage tank described above. Asheville Dyeing & Finishing neither admits nor denies any of the allegations set out in this paragraph."

This Part A application, as filed herein, addresses only the underground storage tank pit area where waste tetrachloroethylene was formerly stored.

ITEM V. FACILITY CONTACT

Director, Employee Relations

ITEM XII. PROCESS CODES AND DESIGN CAPABILITIES

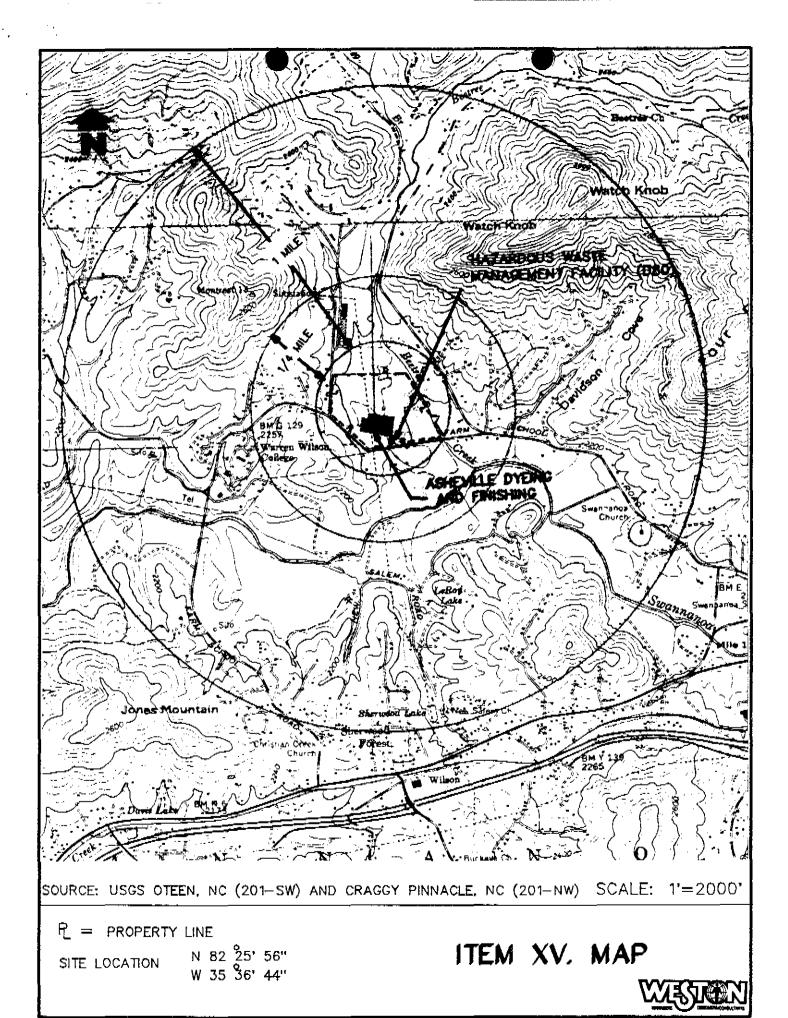
Volume of D80 landfill based on estimated dimensions of former underground storage tank pit of 10 ft. x 20 ft. x 10 ft. deep.

ITEM XIV. DESCRIPTION OF HAZARDOUS WASTES

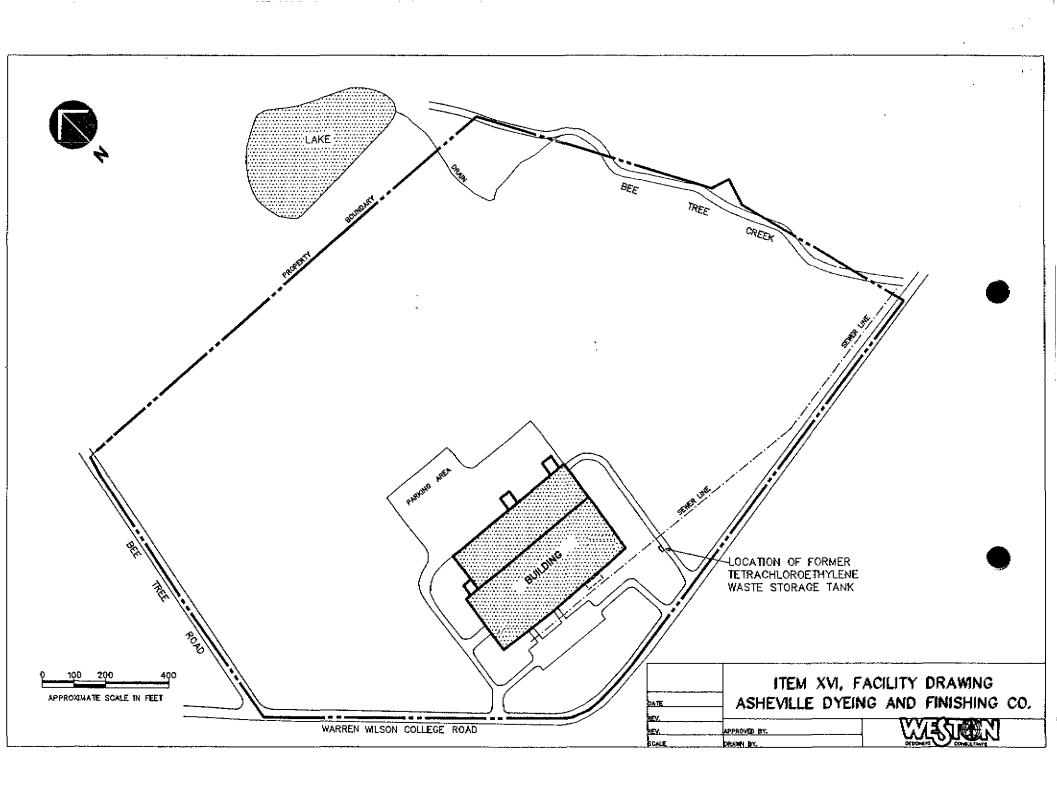
Estimated quantity of waste based on assumption of maximum 1,1,2-trichloroethylene concentration in soil of 1 mg/kg over a 10 ft. x 20 ft. x 1 ft. deep area (i.e., soil immediately underlying previous underground storage tank). This waste represents leakage or spillage associated with operation of an underground storage tank taken out of service in March 1985. The estimated quantity is a conservative, cumulative total of trichloroethylene potentially present in subsurface soils. No additional trichloroethylene wastes are being or will be generated.

ITEM XV. MAP

According to "Geology and Groundwater Resources of the Asheville Area, North Carolina" (Trapp, 1970), four privately-owned wells are located within the immediate vicinity of the facility. Two of these wells are reported to be observation wells; use of the remaining two wells is not identified. However, none of the wells are located within 1/4-mile of the Asheville Dyeing & Finishing facility. The C.D. Owens Company, located within 1/4-mile of the facility, owns and operates several wells on its property; however, these wells are reportedly used for industrial purposes.



*SEE ATTACHMENT



ITEM XVII. PHOTOGRAPHS



SITE OF FORMER UNDERGROUND STORAGE TANK PIT (D80 LANDFILL)
28 JUNE 1990